

1 BARRY J. PORTMAN
Federal Public Defender
2 RONALD C. TYLER
Assistant Federal Public Defender
3 450 Golden Gate Avenue
San Francisco, CA 94102
4 Telephone: (415) 436-7700
5 Counsel for Defendant MOLLY KATZEFF

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR 09-0754 MAG
)	
12 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER CONTINUING STATUS
13 v.)	HEARING EXCLUDING TIME
)	UNDER 18 U.S.C. § 3161
14 MOLLY KATZEFF,)	
)	
15 Defendant.)	
)	
16 _____)	

17
18 **STIPULATION**

19 The parties are scheduled to appear before this Court on October 28, 2009 at 1:30 p.m. for a status
20 hearing. The reason for the continuance is defense counsel has another appearance in Oakland and
21 requests that this matter be continued to November 25, 2009. The next available court date for all
22 parties is November 25, 2009. The government has no objection to this request.

23 The parties also agree that the time between October 28, 2009 and November 25, 2009 should
24 be excluded under the Speedy Trial Act. The continuance is necessary for effective preparation of
25 counsel and continuity of counsel, 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv), and the ends of
26

STIPULATION AND [PROPOSED] ORDER
U.S. v. Molly Katzeff
CR 09-0754 MAG

1 justice served by granting such a continuance outweigh the best interests of the public and the
2 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

3 SO STIPULATED:

4 JOSEPH P. RUSSONIELLO
5 United States Attorney

6 DATED: October 27, 2009

7 /s/
8 ACADIA SENESE
9 Special Assistant United States Attorney

10 DATED: October 27, 2009

11 /s/
12 RONALD C. TYLER
13 Assistant Federal Public Defender
14 Counsel for Molly Katzeff

15 ~~[PROPOSED]~~ ORDER

16 For the reasons stated above, the Court finds that the continuance of time for the next hearing
17 at 8:45 a.m.
18 before this court from October 28, 2009 to November 25, 2009 is warranted because the failure to
19 grant the requested continuance would deny the defendant effective preparation and continuity of
20 counsel; thus, the ends of justice served by the continuance outweigh the best interests of the public
21 and the defendant in a speedy trial. 18 U.S.C. § 3161 (h)(7)(A), (h)(7)(B)(iv).

22 SO ORDERED.

23 DATED: Oct. 27, 2009

24 
25 THE HONORABLE BERNARD ZIMMERMAN
26 United States Magistrate Judge